

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)
KLEHR HARRISON HARVEY
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French & Mudd LLC

Case No.: 23-12825 (MBK)

Chapter: 11

The Honorable Michael B. Kaplan, Chief
Judge

In re:

LTL MANAGEMENT, LLC,¹

Debtor

**APPLICATION FOR AN ORDER
FOR ADMISSION *PRO HAC VICE*
OF THOMAS W. WALDREP, JR.**

Pursuant to Rule 101.1 of the Local Civil Rules for the U.S. District Court for the District of New Jersey and Rule 9010-1 of the U.S. Bankruptcy Court for the District of New Jersey, the undersigned counsel hereby seeks entry of an order granting the admission pro hac vice of Thomas W. Waldrep, Jr., of the law firm Waldrep Wall Babcock & Bailey PLLC, 370 Knollwood Street, Suite 600, Winston-Salem, North Carolina 27103 to represent the law firm of Maune Raichle Hartley French & Mudd, LLC in the above Chapter 11 case.

In support of the application, counsel submits the attached Certification of Thomas W. Waldrep, Jr. and requests that the proposed form of order submitted herewith be entered. Counsel certifies that she is admitted, practicing and a member in good standing with the Bar of the State of New Jersey and is admitted to practice before the U.S. District Court for the District of New Jersey.

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Unless requested by other parties, no oral argument is requested. A proposed form of Order is submitted herewith.

Respectfully submitted,

KLEHR HARRISON HARVEY
BRANZBURG, LLP

Dated: April 17, 2023

/s/ Carol Ann Slocum
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